



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 25, 2023

**By ECF**

Honorable Nina R. Morrison  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States of America v. Rare Breed Triggers, LLC, et al.*  
No. 23-cv-369 (Morrison, J.) (Levy, M.J.)

Dear Judge Morrison:

Pursuant to the Scheduling Order adopted by the Court, the written sworn testimonies of the United States' witnesses are due today, July 25, 2023. *See* ECF No. 60; May 31, 2023 Minute Entry. Accordingly, the United States submits declarations for the following witnesses, including those identified in the United States' Witness List (which was filed on July 20, 2023, *see* ECF No. 90):

1. Declaration of Melissa Rodriguez, Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") Senior Forensic Auditor;
2. Declaration of William Ryan, Chief of ATF's Firearms and Ammunition Technology Division;
3. Declaration of James Hitchcock, ATF Senior Industry Operations Investigator;
4. Declaration of Jonathan A. Lee, ATF Special Agent; and
5. Declaration of Jonathan Robinson, former General Manager of 3<sup>rd</sup> Gen Machine, Inc.<sup>1</sup>

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<sup>1</sup> The United States provides additional context for the inclusion of this declaration, and seeks leave to add this witness to the United States' witness list, in a separate application filed concurrently with this letter.

*United States of America v. Rare Breed Triggers, LLC, et al.*, No. 23-cv-369 (Morrison, J.) (Levy, M.J.)  
Page 2

The United States thanks the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: **By ECF**  
All counsel of record